

United States District Court
Northern District of Ohio
Western Division

Brian Keith Alford

Case No. 3:21 cv 1123

Plaintiff

Judge James C. Carr

v.

Rule 26(f) Report of the Parties

Robert Zilles, et al.,

Defendants

Patricia Horner
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attorney for plaintiff

1. Attendance

Pursuant to FRCP 26(f) and Loc. R. the meeting was conducted on March 15, 2024, attended by

Patricia Horner, attorney for plaintiff

Marcy Vonderwell and Andrew Gatti, attorneys for defendants

2. The parties agree to **Standard** track.

3. Initial disclosures are to be exchanged by April 10, 2024.

4. The parties **do not** agree to the jurisdiction of a U.S. Magistrate.

5. ESI- the parties agree there will be electronically stored information and they have agreed that this information may be subject to a protective order; the parties will submit a stipulated protective order for the Court's approval no later than 10 days following the March 25 Case Management Conference.

Defendants note that they agree to preserve “any remaining documents electronically stored, including videos, *not previously disposed of pursuant to ODRC’s retention schedule*.

Plaintiff agrees to preserve any documentation he has related to this case.

6. Proposed Dates:

- a. Cut-off date to amend pleadings: April 26, 2024.
- b. Cut-off date to add additional parties: April 26, 2024.
- c. Deadline for motions directed at the pleadings: May 17, 2024.
- d. Discovery cut-off: November 30, 2024.
- e. Dispositive motion cut-off: December 31, 2024.
- f. Expert discovery cut-off: December 15, 2024.
- g. Expert reports due Plaintiff- September 20, 2024 / Defendants- October 31, 2024.
- h. Status Conference: June 28, 2024.

7. The parties are amenable to mediation.

Respectfully submitted,

/s/ Patricia Horner
Patricia Horner
Attorney for plaintiff

/s/ Marcy Vonderwell with authority

Marcy Vonderwell
one of the attorneys for defendants

3-19-2024
DATE: _____